

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

HANAN ELATR KHASHOGGI,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:23-cv-00779-LMB-LRV
)	
NSO GROUP TECHNOLOGIES)	
LIMITED, et al.,)	
)	
Defendants.)	
_____)	

UNOPPOSED MOTION FOR ENTRY OF LIMITED PROTECTIVE ORDER

Defendants NSO Group Technologies Limited and Q Cyber Technologies Limited (“Defendants”), by and through their attorneys of record, request the Court grant the following Unopposed Motion for a Limited Protective Order:

WHEREAS, Defendants intend to provide certain documents to the Court in support of a response to the pleadings that they contend are sensitive and highly confidential and should be subject to an attorneys’ eyes only designation (the “AEO Materials”); and

WHEREAS, because there is no Protective Order yet in place, Plaintiff’s counsel agrees that it will not publish or share the AEO Materials with anyone other than counsel of record in this matter, except as agreed to in writing by Defendants, until such time as a confidentiality protective order is negotiated by the parties and entered by the Court or Plaintiff successfully challenges this confidentiality designation with the Court; and

WHEREAS, Plaintiff’s counsel agrees that if no such confidentiality protective order is entered, nor is there a successful challenge to this confidentiality designation, Plaintiff shall return

or destroy all copies of the AEO Materials within 60 days of the final disposition of this litigation;
and

WHEREAS, Plaintiff has agreed not to oppose this motion and that no oral argument shall
be required.

THEREFORE, Defendants respectfully ask the Court to enter the attached Proposed
Limited Protective Order.

DATED: September 24, 2023

By: /s/ Edmund Paul Power
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